

Knapp, Michael

From: Tisa, Kimberly
Sent: Friday, March 31, 2017 4:17 PM
To: Tisa, Kimberly; Wainberg, Daniel
Subject: RE: Region 1 inquiry re. PCBs/Worcester (Mass.) Public Schools

INTERNAL WORK PRODUCT- NOT RELEASABLE UNDER FOIA

I added more language for your consideration. Perhaps once you take a look we can send to Ginny and/or Dave. I really would however, like to run the BMP response by R9 and OPPTs as I mentioned in my VM to you earlier today.

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USEPA
5 Post Office Square, Suite 100
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617.918.1527 (phone)
617.918.0527 (fax)
Tisa.Kimberly@epa.gov

From: Tisa, Kimberly
Sent: Thursday, March 30, 2017 5:21 PM
To: Wainberg, Daniel ; Tisa, Kimberly
Subject: FW: Region 1 inquiry re. PCBs/Worcester (Mass.) Public Schools

My draft responses below in italics. My comments **in red, below. This is very rough and I'm just sending this to you as a starting point. My brain is a bit tired at this point.**

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From: Deegan, Dave
Sent: Thursday, March 30, 2017 3:31 PM
To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>
Cc: Olson, Bryan <Olson.Bryan@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>
Subject: FW: Region 1 inquiry re. PCBs/Worcester (Mass.) Public Schools

Hi Kim & Dan,

Hoping you can help sketch in answers to these follow up questions. I'm glad to draft them if you want to just get me the nugget of what our answer is.

Thanks!
Dave

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Dave Deegan  
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**From:** Fred Hurlbrink [<mailto:hurlbrink@worchester.ma>]  
**Sent:** Thursday, March 30, 2017 3:20 PM  
**To:** Deegan, Dave <[Deegan.Dave@epa.gov](mailto:Deegan.Dave@epa.gov)>  
**Subject:** Fwd: Region 1 inquiry re. PCBs/Worcester (Mass.) Public Schools

Dave,

I rec'd an out-of-office message from Emily Bender which suggested I contact you. Please see below,

And again, thanks for any help you can provide.

-Fred

----- Forwarded message -----

**From:** Fred Hurlbrink <[hurlbrink@worchester.ma](mailto:hurlbrink@worchester.ma)>  
**Date:** Thu, Mar 30, 2017 at 3:15 PM  
**Subject:** Re: Region 1 inquiry re. PCBs/Worcester (Mass.) Public Schools  
**To:** "Bender, Emily" <[Bender.Emily@epa.gov](mailto:Bender.Emily@epa.gov)>

Emily,

Good afternoon. I have a few clarifications and followup questions for you.

**-- You cite 37 Mass. schools as having contact w/ EPA re: PCBs. To be clear, is that individual schools or school districts?**

(b) (5)

**-- Can you confirm the March 2015 update from Worcester Public Schools is indeed the last contact by WPS w/ EPA, including consultation with the regional PCB coordinator?**

(b) (5)

**-- Is there any update on the potential of providing access to the annual reports the school has submitted?**

We can do this, just let me know if you want us to copy info or if we want to request that he submit a FOIA request for this info.

-- Thank you for pointing out that some of the schools' actions are not required by the EPA. What are the repercussions, then, for not following BMPs? Is there a proactive step the EPA would/could take at a certain point (e.g., repeated poor air-testing results, public or private legal action)?

(b) (5)



-- What involvement, if any, does the EPA have with state health departments in air testing and/or other actions re: PCBs? For instance, was there any communication between EPA and DPH following (or prior to) their January testing at Burncoat HS?

(b) (5)



Thanks again, very much, for your time and assistance. The information has been very helpful, and it's important to us to cover this story fairly and completely.

Regards,

Fred

On Tue, Mar 28, 2017 at 11:23 AM, Bender, Emily <[Bender.Emily@epa.gov](mailto:Bender.Emily@epa.gov)> wrote:

Yes. Thanks Fred.

**From:** Fred Hurlbrink [mailto:[hurlbrink@worchester.ma](mailto:hurlbrink@worchester.ma)]

**Sent:** Tuesday, March 28, 2017 9:47 AM

**To:** Bender, Emily <[Bender.Emily@epa.gov](mailto:Bender.Emily@epa.gov)>

**Cc:** Deegan, Dave <[Deegan.Dave@epa.gov](mailto:Deegan.Dave@epa.gov)>

**Subject:** Re: Region 1 inquiry re. PCBs/Worcester (Mass.) Public Schools

Emily,

Good morning. Thank you for your responses.

Should I contact you directly if/when I have followup questions?

Thanks again,

Fred

On Mon, Mar 27, 2017 at 11:16 AM, Bender, Emily <[Bender.Emily@epa.gov](mailto:Bender.Emily@epa.gov)> wrote:

Hi Frank,

Thanks for your inquiry last week. Please see our responses below.

Best,

Emily Bender

U.S. EPA

[617-918-1037](tel:617-918-1037)

[Bender.emily@epa.gov](mailto:Bender.emily@epa.gov)

**-- School officials insist they are following EPA best practices. We are skeptical that this is completely true. How does the EPA track this, and what is your understanding of Worcester Schools' compliance with current EPA BMPs?**

*For schools or other buildings renovated or constructed between 1950 and 1979, as noted in the July 28, 2015 PCB Q&As, EPA recommends actions be taken by school administrators, building owners, and building managers to reduce possible PCB exposures. See following link to document:*  
[https://www.epa.gov/sites/production/files/2016-03/documents/pcbs\\_in\\_building\\_materials\\_questions\\_and\\_answers.pdf](https://www.epa.gov/sites/production/files/2016-03/documents/pcbs_in_building_materials_questions_and_answers.pdf)

*In or about August 2011, Worcester Public Schools (WPS) submitted to EPA, a July 7, 2011 Building Materials Inventory Report for the Francis J. McGrath Elementary School. A "Building Material Management Guide" for WPS owned properties was included as an attachment to this Report. This guide discusses protocols for the management of caulk during building operation, renovation, repair or demolition. While not required by EPA, WPS has provided periodic status updates on its progress*

*related to removal of caulk during window replacement projects. Status updates also included information on fluorescent light ballast removal.*

**-- How often are you in contact with Worcester school officials; when was the last time?**

*While not required by EPA, WPS has provided periodic status updates on caulk removal to EPA with the last update provided in March 2015.*

**-- Would you be able to provide copies of annual reports school officials have said they submit to EPA regarding BMPs?**

*Annual reports are not required to be submitted to EPA. We are evaluating how to provide reports that have been submitted and will follow up with on this matter separately.*

**-- How many school districts in Region 1, and in Mass., are actively involved in PCB remediation and/or removal?**

*EPA does not have comprehensive information on the number of school districts in Mass. or throughout New England that are working in these issues. However, below is information on the number of schools and universities/colleges which have either notified or provided information on PCBs to EPA Region 1. These numbers represent all PCB notifications, including releases from electrical equipment, not just building products such as caulk.*

*Massachusetts: 37 schools and 16 universities/colleges*

*Region 1: 134 schools and 25 universities/colleges*

**-- The schools' consultant said at the March 16 school board meeting that "there's no identified link to cancer of any sort" with PCBs. Is this a prevalent stance, in your experience, despite the positions of the EPA, IARC and other organizations?**

*EPA classifies PCBs as a probable human carcinogen. Information on the health effects of PCBs may be found at the following: <https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls-pcbs#healtheffects>*

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**From:** Fred Hurlbrink [<mailto:hurlbrink@worchester.ma>]

**Sent:** Wednesday, March 22, 2017 10:55 AM

**To:** Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)>  
**Subject:** PCBs / Worcester (Mass.) Public Schools

Kim,

Good morning. I am the editor of Worcester Sun -- we're a fairly new digital-first news organization covering the city.

We began reporting on the PCB issue, prompted by the local teachers union's litigation, in October. Recently, one of our columnists (a former mayor) has taken up the topic. (If interested, [here's his latest column](#) which includes links to our earlier articles.)

We would very much appreciate being able to ask you or one of your colleagues a few questions to ensure we are putting all the puzzle pieces in the right place. (Below are a couple such questions.)

-- School officials insist they are following EPA best practices. We are skeptical that this is completely true. How does the EPA track this, and what is your understanding of Worcester Schools' compliance with current EPA BMPs?

-- How often are you in contact with Worcester school officials; when was the last time?

-- Would you be able to provide copies of annual reports school officials have said they submit to EPA regarding BMPs?

-- How many school districts in Region 1, and in Mass., are actively involved in PCB remediation and/or removal?

-- The schools' consultant said at the March 16 school board meeting that "there's no identified link to cancer of any sort" with PCBs. Is this a prevalent stance, in your experience, despite the positions of the EPA, IARC and other organizations?

Thank you for your time and consideration of this request, and for any assistance you are able to provide. I look forward to speaking (and/or corresponding) with you on this matter.

Regards,

Fred

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**Fred Hurlbrink Jr.**

*VP / Managing Editor*

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